

Children in Northern Ireland



**Response to the Department of Health Budget
2023/24 Equality Impact Assessment**

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Introduction

Children in Northern Ireland (CiNI) is the regional umbrella organisation for the Children's Sector in Northern Ireland. With over 130 members, CiNI is accountable for representing and giving voice to the experiences, views and aspirations of its members across NI to inform and influence those who make policy or plan and deliver services for children and young people. Our vision is to make Northern Ireland a society where all children are valued, treated fairly and are able to flourish. To deliver on this vision, CiNI has three strategic priorities:

- **Influencing:** through campaigning and engagement to ensure that children are at the centre of policymaking;
- **Learning:** capacity building across the sector and innovating best practice;
- **Collaboration:** working with others to increase impact.

CiNI convene two policy forums across the sector: the Child Poverty Alliance (CPA); and the Children with Disabilities Strategic Alliance (CDSA). We are the secretariat to the All Party Group on Children and Young People at the Northern Ireland Assembly and we are represented on the Children and Young People's Strategic Partnership (CYPSP) - a multiagency partnership that includes the leadership of key statutory agencies and community and voluntary organisations, with responsibility for improving the lives of children and young people in Northern Ireland. CiNI is also a member of Safeguarding Board NI, a statutory body constituted to safeguard and protect children.

CiNI offer a wide range of training to both individuals and organisations working within the community and voluntary sector to develop their skills and knowledge through our high quality and positively evaluated Children's Services Training Programme. We also offer bespoke training, tailored specially to the needs of organisations, both within the sector and beyond.

CiNI manage the regional parenting support helpline: Parentline NI. Funded by the Department of Health, this service offers free, confidential advice and guidance to Parents and Carers across Northern Ireland. Parentline also provides one-to-one support, practical workshops, online resources (including podcasts), and referrals to counselling services.

As part of the National Lottery funded 'Gets Active Project', and alongside business partners, CiNI also manages a range of healthy food and physical activity programmes aimed at addressing child food insecurity. In 2022, CiNI established a Youth Advisory Group to help shape these programmes and give young people a platform to influence policy making.

More information is available on our website: <https://www.ci-ni.org.uk/>

About Our Response

Children in Northern Ireland (CiNI) appreciate the opportunity to respond to the public consultation on the Department of Health's Equality Impact Assessment (EQIA) of the 2023/24 Budget Outcome. We recognise the challenging circumstances surrounding the Budget, including the lack of a Northern Ireland Executive and Assembly. We have been a vocal critic of the 2023/24 Budget set by the NI Secretary of State on 27 April 2023, as we believe that it will result in cuts to funding and services that will disproportionately impact children, young people, and their families. It should be noted that the damage caused by budgetary decisions is already being felt by our most vulnerable and marginalised citizens.

On 30 March 2023, the Department of Education (DENI) announced that it could no longer provide funding for the School Holiday Food Grant Scheme - a week before the Easter period when low-income families rely on financial support to provide healthy food for their children who would normally receive Free School Meals in school. DENI also announced an end to 'Happy Healthy Minds', 'Engage', and reduced funding for the Extended Schools programme. These government initiatives, some of which were agreed at Executive level, provided counselling and therapeutic programmes for primary age pupils, learning support, and wraparound care for disadvantaged young people.

On 6 April 2023, [we published an open letter to the NI Secretary of State](#), signed by over 100 organisations and academics calling for the urgent restoration of the Food Grant payments and highlighting the long-term negative consequences of food insecurity for children's health, education, and development. [We also issued a template and guide for members of the public](#) to lobby their MLAs for support in reinstating the School Holiday Food Grant.

Following the announcement of the NI Budget 2023/24 by the Secretary of State on 27 April, we expressed deep concerns about the capacity of the Community and Voluntary Sector (CVS) to cope with extra pressure and reduced funding. We maintain that the manner in which decisions are being made regarding public spending in Northern Ireland is undemocratic, lacks transparency and is entirely unacceptable. The latest guidance issued by the Secretary of State, under section 3(4) of the Northern Ireland (Interim Arrangements) Act 2023, which states in paragraph 10(a) that 'The primary principle that departments must control and manage expenditure within the limits of the appropriations set out in Budget Acts, and as set out in the Secretary of State's statement to the House of Commons of 27 April' will only exacerbate the current crisis by emphasising the need pursue

cost-cutting measures over and above protecting services or tackling disadvantage.¹

On 22 May, CiNI received notification via email from the Permanent Secretary of the Department of Health that our Core Grant funding will end on 30 September 2023. While this letter expresses that ‘difficult financial decisions [...] are being taken with great regret and reluctance’, it goes on to say that ‘the core grant is a small part of the total expenditure which goes to the Community and Voluntary Sector, with the bulk of funding allocated for the direct provision of services.’ In our view, this remark underestimates the impact that the loss of this funding will have on organisations and the wider infrastructure of the sector as a whole. Many of our Member organisations deliver early intervention and family support services, which are part of the critical infrastructure and building blocks in driving forward progress across a range of Programme for Government outcomes. In many instances, government also has a statutory duty to provide these services – such as those laid out in Part IV of the Children (Northern Ireland) Order 1995 – and which are delivered by CVS organisations on behalf of government, by those who have the local knowledge, expertise, and flexibility to respond to the complexity of need in communities. The long-term damage to the Sector, and the related implications for the future of service delivery cannot be ignored.

Our response to this public consultation is framed by the funding cliff-edge faced by our organisation, but we also have a duty to highlight the detrimental impact of budget cuts for our Members (including 19 organisations that receive Core Grant funding) and the harm that these decisions will inflict upon children, young people, and families that we support.

If you require any further information regarding the points that we raise in this response, or if you require an alternative/accessible format please contact CiNI’s Policy Officer, Dr Ernest Purvis – ernest@ci-ni.org.uk

¹ Northern Ireland Office, 25 May 2023, ‘Guidance on decision-making for Northern Ireland Departments May 2023’: <https://www.gov.uk/government/publications/guidance-on-decision-making-for-northern-ireland-departments-may-2023>

Section 75 Data

As set out in the Equality Commission NI (ECNI)'s signposting guide, 'Section 75: Using Evidence in Policy Making', a failure to include appropriate and relevant information when assessing equality impacts may be a failure to comply with the arrangements of a public authority's equality scheme and to pay the appropriate level of regard, which could risk a Section 75 complaint, an Equality Commission investigation or a Judicial Review.² Section 4 of the Department's EQIA, 'Consideration of Available Data and Screening Decision', lists a wide range of sources used when assessing the impact of Budget 2023/24 decisions on Section 75 categories. Ultimately, we agree with the Screening Decision outlined in paragraph 3, which notes that 'Budget 2023/24 policy will impact on a number of Section 75 groups, namely 'Age', 'Gender', 'Disability' and 'Dependent Status'.' However, we wish to draw the Department's attention to significant gaps in the available data that they have considered, which we believe would have been relevant to assessing equality impacts.

In our view, there is a notable lack of data sources linked to Community and Voluntary Sector (CVS) organisations. There is also a lack of evidence relating specifically to children and young people. This is surprising given that one of the Department's 'saving decisions' is to reduce funding for Core Grant Schemes that support CVS organisations working directly with children and their families. Based on the information provided in the Department's EQIA, it is reasonable to assume that they failed to ask CVS organisations to provide any relevant data or evidence to inform their assessment of equality impacts. This contravenes best practice outlined in the ECNI's signposting guide, which clearly notes CVS organisations in the primary list of population level sources. It leaves a notable gap in data sources and consequently limits the extent to which the Department can describe the potential equality impacts of Budget 2023/24 decisions. An apparent failure to consider any data/evidence from the office of the Northern Ireland Commissioner for Children and Young People (NICCY) is also a significant omission.

We believe strongly that the Department should have, at the very least, consulted those CVS organisations impacted by the decision to reduce Core Grant funding and gathered specific data and evidence to inform their assessment of equality impacts. The Department should also have consulted directly with children and young people who were likely to be impacted by savings decisions and used this data to inform their EQIA. This duty is underpinned by Section 75, the Department's Equality Scheme and the rights of children to have their views heard and given due weight according to Article 12 of the United Nations

² Equality Commission for Northern Ireland, 'Section 75: Using Evidence in Policy Making: A Signposting Guide' (p.2): <https://www.equalityni.org/ECNI/media/ECNI/Publications/Employers%20and%20Service%20Providers/Public%20Authorities/S75DataSignpostingGuide.pdf>

Convention on the Rights of the Child (UNCRC). Therefore we strongly recommend that the Department conduct timely, focused engagement with these groups in order to address the clear omissions that are evident in their data sources.

Impact Assessment

Due to the lack of data, the Department's assessment of potential equality impacts arising from spending decisions is short of sufficient detail. The EQIA puts the onus on those responding to the public consultation to provide evidence, interpret data and determine impacts. This is contrary to the principle of the EQIA, and ECNI's guidance, which states clearly that it is for the public authority to evaluate the data it has relied on to determine potential equality impacts of the proposed budget decisions. Assessments must include analysis of the specific policy proposals and the cumulative impacts of those proposals. For example, the EQIA references the reduction in spending on the Core Grant Scheme is 'likely to impact on organisations that are run for the benefit of children'. It goes on to note, 'whilst this funding is not spent on services directly, it is recognised that any reduction in funding to such organisations may make it more difficult for them to continue to provide the same level of support.' The EQIA fails to specify which organisations, the services that they provide, and the likely cumulative impact on children's lives.

Early Intervention and Prevention

The Department of Health's core overarching strategy, 'Health and Wellbeing 2026: Delivering Together', published in 2016 places significant emphasis on Early Intervention and Prevention.³ In her opening remarks, the former Health Minister Michelle O'Neill MLA states, "Critically, we must prioritise prevention and early intervention to ensure that people stay well." On page 5 of the document, which sets out key areas of progress across the health and social care system, it mentions the growth in achievement of Looked After Children, increase in adoptions, and the number of families and children supported by Family Support Hubs. On page 8, the document notes:

"It is clear that economic, social and environmental factors, and experiences early in life, play a major role in determining not just the health outcomes at an individual and community level, but also their social, educational, economic and other outcomes. There is also growing evidence that children who experience adversity in childhood are far more likely to experience health issues in adult life. Specifically, these children are more likely to adopt health harming behaviours during adolescence which can lead to mental health illness and diseases such as cancer, heart disease and diabetes later in life. Adversity in childhood also means that children are more likely to perform poorly in school, more likely to be involved in crime and more likely to experience poverty and disadvantage in adult life."

³ Department of Health (NI), 2016. Health and Wellbeing 2026: Delivering Together - <https://www.health-ni.gov.uk/sites/default/files/publications/health/health%20and%20wellbeing%202026-%20delivering%20together-october%202016%20.pdf>

The proposed outcome of *Delivering Together* is articulated on page 11, as ‘a new model of person-centred care focussed on prevention, early intervention, supporting independence and wellbeing.’ On page 12, the strategy states, ‘the HSC will focus on better tapping into the innovative ideas and energies in communities themselves, and in the community and voluntary sectors.’ There is a clear recognition throughout *Delivering Together* that in order to realise the transformation across the health and social care system that we need to improve public health in Northern Ireland, then there is a need to invest in early intervention and prevention. From our perspective, this means properly resourcing Community and Voluntary Sector organisations that deliver services for children and families.

There should be a clear acknowledgement of the fact, known by practitioners and managers across all sectors, that the success and effectiveness of the Family Support Hub Model relies heavily upon the CVS infrastructure. Put simply, without the broad range of early help and support provided by CVS organisations - tailored to local needs and delivered within the community - then the Hubs would have very little to refer or signpost families to. Any weakening of the CVS infrastructure will negatively impact the effectiveness of Family Support Hubs and the delivery of early intervention and prevention at the community level. From our perspective, the decision to cut Core Grant Funding for CVS organisations contravenes the principles that underpin *Delivering Together*, namely the prioritisation of early intervention and prevention across the health and social care system, and the role of the CVS in helping to deliver upon that promise.

Early intervention is complex and multi-faceted; it is much more than the coordination of support and services through Family Support Hubs. In terms of our Member organisations who receive Core Grant funding, they provide:

- Family and individual support for people with autism;
- A transitions service that involves young people with disabilities and their families to make decisions about their life after school;
- Short breaks and one-to-one social and emotional support for children with disabilities, autism and brain injury to enable them to develop friendships and access social and recreational opportunities;
- A wide variety of group activities and personal development programmes for children with disabilities, autism and brain injury;
- A free, confidential helpline for children;
- Legal advice and representation for children and young people to access critical services and challenge discrimination;
- Information, advice, workshops, training and support groups for parents of children with disabilities;
- Family support, training and programmes for children and young people with learning disabilities;
- Counselling and bereavement support;
- Adoption services and post-adoption support;
- Information, advice and support for foster carers;

- Projects to support children to stay in their own homes and reduce the number of children who are taken into care;
- Parental support and practical help for families;
- Essential skills, training and employability programmes for young people who have experience of living in care;
- Advocacy, participation programmes and activities for children and young people who have experience of living in care;
- Advocacy, advice, therapeutic programmes and family support for people at risk of, and affected by, mental health issues;
- Relationship support and counselling, including specifically tailored therapies and programmes for families, children and young people;
- Palliative care for babies, children and adults living with life-limiting conditions;
- Advocacy, advice and support programmes for blind and partially sighted children and young people;
- Direct financial assistance, food, fuel and household items for families experiencing severe hardship;
- Training, education, advocacy and support services for women and children affected by domestic abuse.

The scale and impact of this work should not be underestimated. Collectively, the support services and advocacy provided by Core Grant recipients can be seen as a central component of Early Intervention and Prevention in Northern Ireland. The organisations that deliver these services will be directly damaged by the cut to the Core Grant Scheme. The Department should be clear and open about what this means: by highlighting the possibility that some service providers will cease to function without Core Grant funding; which services will be impacted and/or reduced; and what this may lead to in terms of deprivation, negative health outcomes, and regression in children's rights.

In June 2023, the final Report of the Independent Review of Northern Ireland's Children's Social Care Services was published. Led by Professor Ray Jones, the Review recommended 'urgent investment [...in] services which assist families within the VCS [Voluntary and Community Sector] and where referrals are received through the Family Support Hubs.⁴ The Report notes:

'The VCS services are in particular experiencing reductions in funding as grants end and with no functioning Executive to take decisions to replace terminating funding streams, such as from the European Union, or to top up and replenish the real-term value of grants amid high inflation. It is destabilising the VCS sector with experienced staff being made redundant, services which have taken time to develop being closed, and the recruitment taking place only able to offer unattractive temporary contracts.

⁴ Professor Ray Jones, 2023. The Report of the Independent Review of Northern Ireland's Children's Social Care Services - <https://www.cscsreviewni.net/files/cscsreviewni/2023-06/The%20NI%20Review%20of%20Children%27s%20Social%20Care%20Services.pdf>

The cut to Core Grant funding by the Department of Health contributes to the destabilisation of the Community and Voluntary Sector referred to in the Independent Review, and it contravenes the recommendations put forward by Professor Ray Jones around strengthening the sector through increased levels of investment, reform of funding arrangements for services, and greater value placed on Early Intervention and Prevention work.

For Children in Northern Ireland (CiNI), the loss of Core Grant funding for 6 months (from October 2023 - April 2024) will mean spending unrestricted reserves to make up the resultant 2023/24 budget deficit and a reduction in available expenditure for our work supporting and collaborating with Member organisations. If we were to lose Core Grant funding entirely for the next financial year 2024/25, the effects would be significantly more severe. This would cause an unsustainable shortfall in funding for our Core posts (CEO; Finance and Office Manager), which will mean searching for alternative funding streams for these costs. Historically, such funding is very difficult to source, as funders prefer to support project costs as opposed to indirect core costs. If additional funding cannot be found, this will place an unsustainable burden on our organisational finances and threaten our ongoing work. It will mean reduced organisational capacity to tender for, and deliver, future contracts; and making staff redundancies to reduce costs.

Community and Voluntary Sector Infrastructure

On 19 May 2023, CiNI launched an online survey for Community and Voluntary Sector organisations to collate information on the impact of cuts to funding, arising from the NI Budget 2023/24, on children and young people. With regard to which specific services or programmes are affected, organisations noted:

- 'ended street work in West Belfast and ended a drug and alcohol programme. We have also reduced our night services from six to four';
- 'Toy box, Pathway, Core Grant and Sure Start';
- '[...] as a community organisation we have seen the ongoing cuts have a severe impact on the work that we undertake and most importantly for us working in a highly deprived area the loss of Extended Schools funding will have a major bearing on how we deliver programmes';
- 'Parent support groups. Child development programs [sic] mental health services';
- 'Early Years, Youth Services, Family Support, After Schools programmes, Parents programmes';
- 'Early Years and Early Intervention Services';
- 'Pathway Fund will affect are [sic] 3 year olds';
- 'NI Executive T:BUC Funding [...] Central Good Relations Funding [...and] Arts Council NI.'

Some of these responses, which refer to Early Years programmes funded by the Department of Education such as Toy Box, Pathway and Sure Start were not ultimately subject to funding cuts. However, as one organisation noted:

'[...] while we are relieved Sure Start services were not cut, without an uplift it means these services are operating with a real terms cut against sharply rising costs. While the loss of service won't be as catastrophic as proposed there will still be less service. We also are awaiting confirmation about our Early Intervention Services - extended to August but uncertain beyond that.. Finally, our Family Support Hubs received no uplift either...so they are operating on the same budget.'

In terms of the main implications of the NI Budget, organisations said:

- 'Significant reduction in support services and youth services for children and young people';
- 'Budget cuts will impact the most vulnerable children';
- 'Main implications will be an increase in anti-social behaviour, lack of support for children and young people in formal and informal sectors, youth services unable to react to emerging need due to little funding';
- 'An increase in anti-social behaviour, the loss of breakfast clubs, after school activities, speech and language classes, children with special needs being deprived of important activities etc';
- 'Holiday hunger, schools breakfast, after school and counselling';
- 'We work with children with disabilities, who already are isolated and excluded from society. These cuts are only going to further isolate and exclude the most vulnerable people in our society';
- 'Highly reduced services to address need';
- 'Closure of settings and redundancy';
- 'We can't afford to keep the children in our care. We have had to use savings to subsidise the cost of care and these are running out';
- 'The most vulnerable young people on FSM or in areas of high deprivation will be most badly impact[ed] - the academic attainment gap between the most academically able and those young people not meeting the minimum educational levels at post-primary level are already the widest in Europe and have been for some years, so the impact of this budget will only exacerbate the gap of social mobility and opportunity for our poorest children';
- 'Cuts will further reduce capacity and speed of access to children and families seeking mental health and behavioural support';
- 'The domino effect. A lot of the VCSE operates through partnership working and provides an infrastructure for a continuum of care that often is lacking via statutory provisions alone. One cut in a service impacts a lot of the other services that are collaborating on shared outcomes (for example, [Family Support] Hubs). Also this infrastructure is hard to build and relies a lot on relationships built over time, and we are concerned that if it is stripped bare, the workforce challenges that are already a factor, will be exacerbated by the uncertainty facing the sector more widely. That lost expertise and passion could have detrimental impact over the long term.'

Other comments from organisations included:

- 'We are undoing years of hard work and storing up a generation of problems which will cost millions more to try to repair in the future';
- 'The youth sector needs consistent funding both in day to day money but also capital money. The voluntary sector is on its knees and our government needs to act now';
- 'We need an Executive at Stormont and we need major intervention from the British Exchequer to sort out many years of conflict which left this place and society needing funding';
- 'Short term solutions which will impact further down the line. Statutory services will not and cannot cope with the demands when VCS services disappear';
- 'Over many years children's services budgets were under pressure, they are just significantly worse with serious impact for the future';
- 'I worry that these budget cuts have a significant negative impact on the most vulnerable members of our communities. Early intervention is vital in the overall development of every child and if these services cease, the most vulnerable children will be impacted.'

Despite the fact that some of the funding cuts referred to in the survey responses refer to decisions made by other government departments, the information that we have gathered is relevant to the Department of Health's EQIA and the decision to reduce funding for the Core Grant Scheme. The evidence from the survey highlights the extremely challenging funding environment that CVS organisations are currently navigating, and the reductions in services that they are being forced to implement. Redundancies, closures and the use of savings/reserves all demonstrate the fragility of the CVS infrastructure and how funding cuts threaten the sustainability of organisations that provide services directly to children, young people and their families. This is important because of the interconnected nature of services and collaboration between CVS organisations, as discussed by respondents to the survey. We agree strongly with the comments outlined above, which argue that funding cuts and reductions in services will have a multiplier effect, and that weakening the CVS infrastructure through, for example, reducing the budget for the Core Grant Scheme, will also negatively impact the efficacy of key partners in delivering upon shared outcomes. The cumulative impact of the loss of knowledge and expertise, key relationships and collaboration is difficult to qualify or quantify, but again we would reemphasise the comments from CVS organisations that highlight increased pressure and costs for statutory services and the long-term consequences of making short-term savings decisions.

Cumulative Impact and Disadvantage

The information provided by Community and Voluntary Sector organisations, as part of CiNI's survey, also points to the cumulative impact of budget cuts on the most disadvantaged and marginalised children in Northern Ireland. In order to live

within its budgetary allocation, the Department of Education is making a range of savings decisions. These include:

- Ending the Engage, Happy Healthy Minds and School Holiday Food Grant schemes from 31 March 2023;
- Reduction in the Aggregate Schools Budget;
- Reduction in the Education Authority (EA) Block Grant;
- Reduction in funding for Extended Schools; and
- Cessation of funding for third party organisations supporting curriculum delivery.

These savings measures, amongst others, are outlined in the Department's Equality Impact Assessment published on 19 June 2023.⁵ This document notes that children 'will experience major negative impacts from budget reductions to School Holiday Food Grant, EA Block Grant, Engage Programme and Healthy Happy Minds and minor negative impacts from budget reductions to Playboard NI Play Policy, Aggregated Schools Budget, Extended Schools, North Belfast Principals Support Programme and BookStart Programme.' The Department also state that children with a disability 'will experience major negative impacts from budget reductions to SEN [Special Educational Needs]' and that 'SEN includes SEN Block Grant, LSC and Implementation of SEND ACT 2016, SEND Transformation Programme, SEND Implementation Team SEND ACT (NI) 2016, Enhanced Autism Training Framework, [and] SEN Early Years Inclusion Service.'

The Education Authority (EA), which is responsible for the day-to-day funding of schools and youth services, has stated that it would need to make approximately 6,600 staff redundant to deliver the savings required. Referring to the savings decisions made by the Department, the EA's Chief Executive Sara Long has stated 'there is no doubt that the earmarked funds are targeted at those most vulnerable children. The cumulative effect and impact of that will be very pronounced. Also, the funds are targeted at mental health, wellbeing, underachievement and our most vulnerable children. The fact that they are earmarked but are not part of schools' budgets or the Education Authority's core budget is also something that makes them less sustainable than they ought to be.'⁶ In May 2023, the EA's board were considering how to address a potential funding shortfall of over £200m for 2023/24, and according to journalists' reports, agreed approximately £14m in savings. The Board's Chair, Barry Mulholland, was reported as saying that any decisions to reduce spending further would 'impact every child in Northern Ireland and will also have a disproportionate impact on the most vulnerable and those from socially deprived areas.'⁷ In June 2023, the Education

⁵ Department of Education (NI), 2023. EQIA Consultation Report on the 2023-24 Resource Budget - <https://www.education-ni.gov.uk/sites/default/files/consultations/education/DE%20Resource%20Budget%202023-24%20-%20Equality%20Impact%20Assessment%20Consultation.pdf>

⁶ Northern Ireland Affairs Committee, House of Commons, 24 May 2023. Oral Evidence: the funding and delivery of public services in Northern Ireland, HC 1165.

⁷ Robbie Meredith, BBC News NI, 9 May 2023. NI Education: Education Authority 'reluctantly' submits £14m cuts' - <https://www.bbc.co.uk/news/uk-northern-ireland-65527575>

Authority notified schools that funding for SEN Coordinators, who support and help SEN children with their learning and monitor progress, was reduced from £22m to £11m for 2023/24.

In CiNI's view, the funding cuts across the education system are disproportionately impacting the most vulnerable children. The programmes that have ceased, or been significantly reduced, include: financial support to low income families to help with the cost of food; counselling and therapeutic programmes for primary age children; learning support and wraparound care for the most disadvantaged young people. Taken together, they represent cuts of a scale and cumulative impact that will cause significant harm to the most vulnerable children, young people and their families. The cuts contravene long standing Ministerial policies and cross-departmental efforts to tackle disadvantage and social exclusion.

On 27th June 2023, a group of academics from Ulster University, Stranmillis University College, Queen's University Belfast and Newcastle University published a 'rapid response' report to 'inform the general public of the cumulative impact of the ongoing cuts and to warn public representatives, officials and the UK and Irish Governments of the far-reaching societal impact of this sudden imposition of austerity measures on education provision in NI.'⁸ The authors note that 'the short-term savings which are made by cutting programmes to tackle educational disadvantage are likely to be dwarfed by the costs which will be generated in the long run. The removal of, or deep cuts to, schemes such as those to alleviate holiday hunger, period poverty and the high costs of school uniforms have a cumulative impact on groups which are already disadvantaged, in terms of their experience of education provision. This is particularly problematic in light of the shortcomings in the operation of public sector equality protections [...] Our overarching conclusion is that the cuts will increase poverty, widen existing educational achievement gaps, further exacerbate NI's mental health crisis and send Special Education Needs provision beyond the brink of collapse.'

The wider social and economic context surrounding the NI Budget 2023/24 should play a major role in departmental decision-making. Low-income families in particular are under immense financial pressure and mental strain, struggling to cope with rising costs. As noted by the Centre for Progressive Policy:

"Evidence of deepening hardship taking place on a mass scale can be seen in the record levels of households now receiving universal credit (UC), which has more than doubled since 2020 due to pressures from rising bills and prices. This hardship is also seen through the rapidly increasing number of households receiving support for housing costs, with the total number having tripled since the

⁸ Fitzpatrick et al. (2023). The Consequences of the Cuts to Education for Children and Young People in Northern Ireland - <https://www.stran.ac.uk/wp-content/uploads/2023/06/The-Consequences-of-the-Cuts-to-Education-for-Children-and-Young-People-in-Northern-Ireland-Final.pdf>

end of 2019, now encompassing roughly one in six households, and notably, one in four within the private rented sector.”⁹

Private rents across Northern Ireland increased by 9.6% between April 2022 and April 2023, compared with 5.1% in England, 5.8% in Wales, and 5.5% in Scotland (all in the 12 months to June 2023).¹⁰ National Energy Action estimate that around 45% of households in Northern Ireland live in fuel poverty, defined as spending more than 10% of their income on home energy costs, which is more than double the most recent official figure for fuel poverty in NI from 2016 of 22%.¹¹ Northern Ireland’s significant dependency on home heating oil and lack of regulation of the market also exposed families to extreme price increases for significant periods of time without government support or intervention. According to the Office for National Statistics (ONS), food price inflation reached its highest level in over 45 years – peaking at 19.2% in March 2023.¹² The Food Foundation have reported that the most deprived fifth of the population would need to spend 50% of their disposable income on food to meet the cost of the government recommended healthy diet.¹³ The Consumer Council NI estimates that the discretionary income of the lowest earning households has fallen for 7 consecutive quarters since 2021, and was roughly £19 a week for the last quarter of 2022.¹⁴

As part of the ‘Gets Active Project’ - a range of food and activity programmes targeted at disadvantaged children, CiNI manages a Youth Advisory Group comprised of young people from Carrickfergus, Downpatrick, Portadown and Limavady. These young people shape the holiday programmes in their respective areas and take part in CiNI’s policy development and influencing work related to child poverty and food insecurity. Prior to the announcement of the Northern Ireland Budget 2023/24, the Youth Advisory Group completed a research project to examine the impact of rising cost-of-living pressures on young people and families by surveying their peers. The Group received responses from 210 young people, aged between 11 and 25, which showed that:

⁹ Ross Mudie, Centre for Progressive Policy, July 2023. The cost of living crisis in Scotland, Wales and Northern Ireland: How rising costs are hitting different places in the devolved nations - https://www.progressive-policy.net/downloads/files/PPP_CoL-Devolved-nations_report_July-2023_SP_2023-07-18-144113_omnr.pdf

¹⁰ Office for National Statistics, May 2023. Index of Private Housing Rental Prices, UK: April 2023 - <https://www.ons.gov.uk/economy/inflationandpriceindices/bulletins/indexofprivatehousingrentalprices/june2023>

¹¹ This estimate is based on an NI-wide representative survey conducted by National Energy Action in June 2022. Key findings are published here: <https://www.nea.org.uk/wp-content/uploads/2023/04/NEA-NI-Tackling-Fuel-Poverty-Leaflet.pdf>. See also: Housing Executive (2016), ‘House Condition Survey’ - <https://www.nihe.gov.uk/getattachment/975a319a-9516-4f0b-a095-382332405ff0/HCS-Main-Report-2016.pdf>

¹² Office for National Statistics, July 2023. Cost of living insights: Food - <https://www.ons.gov.uk/economy/inflationandpriceindices/articles/costoflivinginsights/food>

¹³ Food Foundation, June 2023. The Broken Plate 2023: The state of the nation’s food system - <https://foodfoundation.org.uk/publication/broken-plate-2023>

¹⁴ Consumer Council (NI), April 2023. Q4 2022 Northern Ireland Household Expenditure Tracker - <https://www.consumercouncil.org.uk/sites/default/files/2023-04/FINAL%20VERSION%20-%20April%202023%20-%20Household%20Expenditure%20Tracker%20Q4%202022%20%28Oct-Dec%29.PDF>

- 50% of families were using less heating;
- 29% of families had reduced their food bill;
- 33% of young people were experiencing feeling cold more often;
- 21% of young people were experiencing feeling hungry more often;
- 14% of young people were skipping meals because they could not afford enough food;
- 19% of young people were unable to concentrate in school because of feeling hungry or being worried about money for food; and
- 24% of young people have had to exclude themselves from social activities because they could not afford it.

When the Department of Education announced the cessation of the School Holiday Food Grant, CiNI provided the young people involved in the Gets Active Project with feedback forms to gather information on how this would impact children, young people and their families. The young people wrote:

- 'The decision to cut this financial support can impact children/young people/families as the reason they were on free school meals was because they couldn't afford to buy or make lunch while in school. This decision will impact the people of the community as families will not have enough money to afford food therefore meaning they will skip meals and parents may not eat anything which is not healthy';
- 'Some families may struggle to afford to maintain the food habits that their children have been previously introduced to, due to some jobs not working over the holidays, some parents may not be earning income. Also due to the recent cost of living crisis, this may become increasingly harder for parents to keep up';
- 'It will affect how people function as they will be really hungry'; and
- 'Less of everything again which is causing more stress to young people again.'

In order to live within its budget allocation, the Department for Communities is making a range of savings decisions. On 21 June 2023, the Department stated that it will continue to carry around 600 vacancies, which is likely to impact service delivery, most notably the administration of social security. The Department also announced a reduction in funding for the Rates Support Grant; reduction in the budget for Discretionary Support Grants; proposed reduction in new social housing compared to 2023/24 target; reduction in funding for the Affordable Warmth Scheme; and a reduction in Arm's Length Body budgets, which includes the Northern Ireland Commissioner for Children and Young People. In its draft Equality Impact Assessment for proposed changes to the Discretionary Support Scheme, published on July 2023, the Department states that it had received almost 200 responses to the public consultation on its Equality Impact Assessment of the proposed Departmental Budget 2023/24 by 7 June, and 27 responses were regarding potential cuts to the Discretionary Support Grant Budget.¹⁵ The Department note, 'the main concern raised was about reducing the budget during

¹⁵ Department for Communities, May 2023. Budget 2023-24 Equality Impact Assessment - <https://www.communities-ni.gov.uk/sites/default/files/consultations/communities/dfc-budget-2023-24-egia.pdf>

the cost of living crisis and the impact that would have on those on the lowest incomes. Some Section 75 groups were highlighted as those most likely to be affected such as women, people with disabilities and those with dependants.' With regard to the proposed measures to restrict Discretionary Support Grants, the Department state that, 'A Child Rights Screening was conducted and a full Impact Assessment was not considered necessary. A full Child Rights Impact Assessment would not be proportionate as support is still being provided, though somewhat limited, to meet both essential and non-essential needs, and it is intended for this support to be maintained throughout the financial year.' However, the potential for low-income households with children to be without essential items such as cookers and beds increases if the 'repeat item exclusion period' is extended as proposed. Restricting grant awards to basic needs also means that families will not be able to avail of discretionary support for items considered 'non-essential', which includes floor coverings and kitchen items (kettles, toasters etc.).

On 30 June 2023, The Executive Office completed a Child Rights Impact Assessment of their spending plans for 2023/24 and noted, 'In Phase 1 of the EQIA responses, one community group noted the equality impact on young people in rurally isolated single identity villages or isolated farm properties in that the ability to meet and develop positive relationships with people from the other community backgrounds is limited with most local schooling being religiously segregated and there already being very limited youth work provision in rural areas. Another group makes the point that in addition to Section 75 equality impact, that the Department should consider the impact on low income households who will disproportionately be impacted by cuts across the board.'¹⁶ The Report and Recommendations on the EQIA for the Executive Office's Spending Plans for 2023/24 includes a summary of responses to the public consultation concerning proposed cuts to the District Council Good Relations Programme (DCGRP) and Central Good Relations Fund (CGRF). It states, 'Cuts to the DCGRP and CGRF will lead to a reduction in GR delivery and capacity [...] a loss of opportunity, especially for the young [...] increased risk to the vulnerable in society [...] may lead to an increase in civil unrest and sectarian tension [...] and may lead to the disbandment of some community and voluntary groups.'¹⁷ It goes on to state, 'some respondents urged that the 'Children and Young People' area should not be cut or the most deprived in communities eg, [sic] Sure Start Programmes, Neighbourhood Renewal Programmes also need to be protected further.' One organisation noted the potential loss of a trained Child Protection Officer.

¹⁶ The Executive Office, June 2023. Children's Rights Impact Assessment: The Executive Office's Spending Plans for 2023-2024 - <https://www.executiveoffice-ni.gov.uk/sites/default/files/consultations/execoffice/childrens-rights-impact-assessment-spending-plans-2324.PDF>

¹⁷ The Executive Office, June 2023. Report and Recommendations on the EQIA for the Executive Office's Spending Plans for 2023-2024 - <https://www.executiveoffice-ni.gov.uk/sites/default/files/consultations/execoffice/eqia-report-and-recommendations.PDF>

CiNI has had sight of a summary of key findings from research conducted with young people by Queen's University Belfast and the Education Authority's Youth Service, commissioned by the Child Criminal Exploitation (CCE) Task and Finish Group. This research shows that 'the influence of paramilitaries as enduring criminal networks are often embedded into and create community norms, which then drive behaviours. In some areas, this activity affects the whole community and even creates a narrative that in the absence of trust in public bodies, they are performing a community function. Some young people felt that paramilitaries provide a protective factor, have different motivations to OCGS [Organised Criminal Groups] and acted as a buffer against the risk of 'true' organised criminals - a symbolic smokescreen leading to cognitive tension'.¹⁸ Other findings included:

- 'The pervasiveness of substance use and widespread alcohol use which is highly normalised for many young people in communities - drug use appeared to be endemic';
- 'Young people feel they have limited choices, little or no alternatives';
- 'Young people did not consider themselves to have any material agency - rather they were passive recipients of harm decided by those engaged in criminal networks';
- 'Academic engagement and achievement is predictive of better outcomes and may act as a buffer against wider systemic risks in communities'; and
- 'Girls and young women are more likely to be the victims of sexual violence and as the degree of influence increases become more engaged in criminal activity [...] They are at particular risk of being exploited via drugs to engage in sexual activity within criminal and non-criminal networks. They described entering into a transaction where the supply of substances was met with the expectation of sexual favours. This highlights the overlap between CSE [Child Sexual Exploitation] and CCE.'

In terms of safeguarding children at risk from criminal exploitation, CiNI's view is that the scale and cumulative impact of funding cuts arising from the NI budget 2023/24 will exacerbate the range of contextual vulnerabilities that contribute towards contextual harm. In other words, due to the reduction in support services and diversionary activities, more children will be exposed to risk and the nature of that risk may be more severe if their circumstances are compounded by the withdrawal of support on multiple fronts.

On 15 May 2023, the Department for Infrastructure published its Equality Impact Assessment of its Resource Budget 2023/24 outcome and used responses received by 12 June 2023 to inform initial budget allocation. The EQIA document notes that 'the 2021 Travel Survey for Northern Ireland data also shows that young people (both 0-15 and 16-24) were more likely to make a higher percentage of journeys by walking, cycling or public transport than other age groups [...] and] in 2021 nearly half (48%) of all people killed or seriously injured in road collisions

¹⁸ Child Criminal Exploitation (CCE) Task & Finish Group, April 2023.

were ages 34 or under; therefore, cuts to road safety may impact disproportionately on younger people.¹⁹

CiNI's analysis of funding cuts affecting children and young people across a range of government departments, arising from the NI Budget 2023/24, shows that there is likely to be a multiplier effect. That is to say, the cumulative impact of the Budget, when considered as a whole, will have an effect that is greater than the sum of the individual effects of each funding cut or savings decision made by a specific department. For example, CiNI's analysis of the cut to Core Grant Funding by the Department of Health shows how services for children living in poverty, looked after children, and children with disabilities could all be negatively impacted. Many of these same children will also be negatively impacted by the funding cuts announced by the Department of Education. For example, Core Grant Funding supports organisations like CiNI, who provide food and activities for children entitled to Free School Meals during school holidays. The School Holiday Food Grant previously supported families to provide food for their children who are eligible for Free School Meals when they are not in school. As a result of the funding cuts arising from the Budget, families on the lowest incomes have less money to spend on food during school holidays and their children may have less opportunity to attend a programme where some food is provided due to reductions in services across other organisations. These families will also have less recourse to financial assistance through the Discretionary Support Scheme, all of which may exacerbate levels of food insecurity among young people across Northern Ireland leading to negative health outcomes. With a reduction in support services and higher levels of deprivation, it is likely that more young people will be at risk from Child Criminal Exploitation or engage in other illicit activities. This risk is significantly more severe when accounting for the cumulative impact of cuts as opposed to considering, for example, the reduction in funding for Good Relations projects made by the Executive Office in isolation.

There are many varied and complex factors when considering the cumulative impact of the NI Budget 2023/24 on children and young people, as the analysis by the Department for Infrastructure, previously noted, demonstrates yet another element around road safety risks. It is also very difficult to quantify the impact, for example, in terms of how savings decisions by departments may affect specific public health measures such as life expectancy. CiNI is concerned that certain groups of children and young people, such as those entitled to Free School Meals and those with disabilities, will be disproportionately impacted by funding cuts arising from the Budget. It may be the case that, as a result of cuts by the Departments of Health and Education, children with Special Educational Needs and disabilities experience greater developmental delays, longer waits for treatment or care, and less support leading to a regression in fulfilment of their

¹⁹ Department for Infrastructure, May 2023. Budget 2023-24 Equality Impact Assessment: Public Consultation - <https://www.infrastructure-ni.gov.uk/sites/default/files/consultations/infrastructure/eqia-consultation-document-budget-2023-24.pdf>

rights under Article 23 of the United Nations Convention on the Rights of the Child, which states 'assistance [...] shall be designed to ensure that the disabled child has effective access to and receives education, training, health care services, rehabilitation services, preparation for employment and recreation opportunities in a manner conducive to the child's achieving the fullest possible social integration and individual development, including his or her cultural and spiritual development.'²⁰

CiNI contend that the cumulative disadvantage faced by children and young people, arising from the NI Budget 2023/24 poses significant economic, social and human costs. It is CiNI's view that children and young people are disproportionately impacted by the funding cuts made by government departments, consequent to the Budget, and that the combined effect of these decisions is greater than the sum of individual impacts for some groups of children, including those from the lowest income backgrounds and children with disabilities and special educational needs. CiNI strongly believe that the Department of Health should consider how their savings decisions, and the reduction in funding for the Core Grant Scheme in particular, will contribute to the disproportionate and cumulative disadvantage suffered by children as a result of the Budget. The Department should also undertake a Child Rights Impact Assessment and intersectional analysis of budgetary decisions, to highlight areas where children and young people of multiple identities, and those experiencing multiple layers of inequality, may be impacted.

²⁰ United Nations Convention on the Rights of the Child, 1990. Article 23 - <https://www.unicef.org.uk/wp-content/uploads/2016/08/unicef-convention-rights-child-uncrc.pdf>

Mitigating Actions

On 1 June 2023, the Department of Education announced that it was not proceeding with proposed cuts to Youth Services and a range of Early Years programmes including the Pathway Fund, Sure Start, Bright Start and Toybox. In a statement, the Permanent Secretary Dr Mark Browne said, 'In considering the scale and cumulative impact of the proposed cuts, which represent a major change to long standing Ministerial programmes and policies, I am of the view that such a decision should be taken by a Minister, not a Permanent Secretary. Evidence shows that the scale of the proposed cuts to Early Years, Extended Schools and Youth Service programmes would create greater budgetary pressures for the next financial year and beyond across a range of areas, including special educational needs. Furthermore, the reductions would cause significant detriment to the provision of services for our most vulnerable children, young people and families, and run counter to all the Department's efforts to tackle educational disadvantage.'²¹

In light of the decision taken by the Permanent Secretary of the Department of Education, who referred directly to 'all of the principles in the Secretary of State's decision making guidance' that supplement the statutory powers to make budgetary decisions under the Northern Ireland (Interim Arrangements) Act 2023, CiNI wrote to the Permanent Secretary of the Department of Health, Peter May, on 1 June 2023 and asked him to clarify the decision-making process of the Department surrounding the Core Grant Scheme. We expressed our serious concerns around the impact of the reduction in funding, which we said would cause irreparable damage to the Community and Voluntary Sector infrastructure that supports the Department in its policy development and delivery of services to our most vulnerable and marginalised citizens. We advised that the decision to cut the Core Grant Scheme is harmful, short-sighted, contradictory to the Department's statutory duties and strategic goals, and should be reversed. CiNI remain firmly of the view that the primary mitigating action required by the Department is a reprioritisation and reallocation of resources that would allow for the Core Grant Scheme to be fully funded.

We feel it is important to highlight that the rationale outlined by Dr Mark Browne in relation to not proceeding with funding cuts to Early Years programmes cites the 'scale and cumulative impact [...] which represent a major change to long standing Ministerial programmes and policies.' Dr Browne also notes evidence showing that proposed cuts would create greater budgetary pressures for the next financial year and beyond, across a range of areas [...] and would cause significant detriment to the provision of services for our most vulnerable children.' In CiNI's

²¹ Department of Education, 1 June 2023. 'Department of Education protects funding for vulnerable children and young people' - <https://www.education-ni.gov.uk/news/department-education-protects-funding-vulnerable-children-and-young-people>

view, this rationale is directly relevant to the Department of Health's decision-making regarding the Core Grant Scheme, especially given the recent Ministerial intervention regarding the funding. In 2017, the former Minister of Health, Michelle O'Neill MLA, announced that she was not proceeding with reductions to the level of Core Grant funding provided to the Community and Voluntary Sector. In a statement published by the Department of Health, the Minister is described as being 'concerned that the closure of the core grant scheme would leave a significant gap in relation to the strong advocacy role performed by the voluntary and community sectors.'²² The former Minister is quoted as saying, 'many voluntary and community sector organisations work closely with users of health and social care services and can advocate on their behalf. This has the potential to help us shape health and social care services in the future, to make them better and more responsive to the needs of the people of the north who they are intended to serve.'

CiNI are also deeply concerned about the impact on children and young people of proposed reductions in health improvement programmes; further reductions in public information campaigns; reduction in Family Health Service spending; restricting the range of core demand led services across Acute and Community services; and reduction in funding for waiting list initiatives. The Department should provide further detail, alongside their assessment of potential options, so that consultees are able to provide constructive comments regarding mitigating actions. Due to the lack of an Assembly and Executive, the Department must also do more to facilitate transparency and scrutiny of their decision-making, for example, by publishing the details of any formalised processes, procedures, assessments, evaluations, business cases and/or matrices that they use to account for savings decisions. This is of vital public interest, which would increase transparency and accountability, by allowing for more detailed analysis of whether the decisions taken, amongst all the avenues available, effectively prioritise the needs and rights of Section 75 population groups such as children and young people.

²² Department of Health (NI), 13 January 2017. 'Core Grant Funding for voluntary and community sector to continue – O'Neill - <https://www.health-ni.gov.uk/news/core-grant-funding-voluntary-and-community-sector-continue-oneill>

Conclusion

On 2 June 2023, the United Nations Committee on the Rights of the Child recommended that the UK, as the State party, incorporate a child rights-based approach into the budgeting process in all jurisdictions, including Northern Ireland.²³ The Committee recommended:

- 'A tracking system for the allocation, use and monitoring of resources for children, with a view to eliminating disparities and ensuring equitability, and assess how investments in all sectors serve the best interests of children';
- 'Budgetary allocations for children in disadvantaged situations and ensure that children are not affected by austerity measures';
- 'In situations of economic crisis, regressive measures are not taken without meeting the requirements set out in paragraph 31 of the Committee's general comment No. 19 (2016) on public budgeting for the realization of children's rights, including that children participate in the decision-making process relating to such measures';
- That the UK Government 'withdraw the budget for Northern Ireland for the period 2023-2024 and fully consider the equality and human rights implications for a new budget, taking all possible steps to mitigate any adverse impact on children's rights before issuing a revised budget'; and
- 'Transparent and participatory budgeting in which civil society, the public and children can participate effectively.'

The UN Committee's call to withdraw the budget for Northern Ireland and fully consider the equality and human rights implications for a new budget is significant and echoes CiNI's assessment of the cumulative adverse impact on children and young people arising from the decisions taken by NI departments. We acknowledge the difficult choices faced by officials. However, it is imperative that departments conduct a comprehensive assessment of equality impacts, and use this evidence to inform their decision-making, so that Section 75 groups such as children and young people are protected and not disproportionately affected by savings decisions required to live within their 2023/24 allocations. Our response to the Department of Health's EQIA has highlighted gaps in the data that they have used, and the urgent need to consult children, young people and organisations impacted by cuts.

CiNI's analysis has also emphasised the cumulative impact and disadvantage arising from the NI Budget 2023/24, by examining how the Department of Health's decision to cut funding for the Core Grant Scheme will damage the Community and Voluntary Infrastructure that delivers Early

²³ United Nations Committee on the Rights of the Child, 22 June 2023. Concluding observations on the combined sixth and seventh periodic reports of the United Kingdom of Great Britain and Northern Ireland, CRC/C/GBR/CO/6-7 -

<https://docstore.ohchr.org/SelfServices/FilesHandler.ashx?enc=6QkG1d%2FPPrCAqhKb7yhskHOj6VpDS%2F%2FJqg2Jxb9gneCSVxGjVOKzNqKQlfqkpWhZZ88oYLh6GgITPdojzFi9IFi3B7SPVgM%2BQqVUVvYZqvGm3fRTpchvuK%2F4tcpdyq>

Intervention and Prevention Services, and how certain groups of children such as those from low-income backgrounds, looked after children and children with disabilities will be disproportionately affected by reductions in support services. We strongly urge the Department, in light of the concerns raised by CiNI and many other organisations in response to their EQIA, to carefully consider alternative avenues for achieving necessary savings while minimising the negative impacts on children and young people. As an important first step, funding for the Core Grant Scheme must be restored for 2023/24. It is imperative to safeguard the rights of our most vulnerable and marginalised citizens, ensuring that their specific needs are adequately met in the context of wider social and economic forces that are causing families severe hardship. CiNI is grateful for the opportunity to respond to this public consultation and we hope that the information and evidence provided will inform decision-making that prioritises the welfare and support of our children and young people.